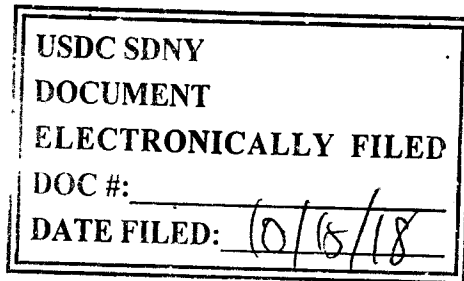


**Lewis
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Middlemiss**
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Ronald Abramson
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October 12, 2018

VIA FAX: 212-805-7942

Hon. Alvin K. Hellerstein
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Kaufman v. Microsoft Corporation, 16-cv-2880 (AKH)
Letter Motion Requesting Extension of Case Schedule

Dear Judge Hellerstein:

Plaintiff Michael Philip Kaufman respectfully renews his request for an extension of the current case schedule by four weeks. Defendant Microsoft Corporation joins this request. The parties agree that fact discovery can be completed in the proposed schedule below.

Since the Court's denial of Plaintiff's original request (D.I. 75), the parties have made substantial progress toward completing discovery. Plaintiff has completed its production of documents and Defendant will complete its production of documents on or before October 19, 2018. The parties have scheduled all party depositions, with Plaintiff being deposed November 1 and 2 and the Defendant and certain of its employees being deposed October 26, November 7, 8, 13, 15, and 16.

Extending the close of fact discovery until November 16 will allow adequate time for review of documents and taking of depositions and will otherwise allow the parties to complete fact discovery in an orderly fashion. Barring new information that provides good cause for additional requests, the parties do not envision any further requests for discovery.

There has been one previous request for adjournment or extension of the below events, which the Court denied as premature, but granted leave to renew "with parties showing substantial progress of fact discovery toward completion by the agreed-upon date" (D.I. 75), and there are no additional events scheduled after these dates.

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The case schedule before and after the extension proposed above is as follows:

Current dates (from D.I. 69):

- Completion of fact discovery: October 19, 2018.
- Parties meet at Plaintiff's office to discuss settlement: October 24, 2018 at 10:00 AM.
- Next status conference: November 2, 2018, at 10:00 AM.

Proposed dates:

- Completion of fact discovery: November 16, 2018.
- Parties meet at Plaintiff's office to discuss settlement: November 28, 2018 at 10:00 AM.
- Next status conference: December 7, 2018 at 10:00 AM. ~~(if acceptable to the Court)~~

Thank you for your consideration of this request.

Respectfully submitted,



Ronald Abramson

cc: Counsel of Record (via email)